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December 13, 2024

File No. 26756.88

Via ECF

Hon. Vernon S. Broderick
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Z.A., an infant by and through his Parents and Natural Guardians, and Carmit
Archibald, George Archibald v. Hyatt Corporation
Docket No. 1:24-cv-03742-VSB

Dear Judge Broderick:

Our firm is counsel to Defendant, Hyatt Corporation (“Defendant”), in the above-referenced matter. We are writing to Your Honor to respectfully request an Order staying discovery until the currently pending dispositive motion has been decided. Briefly, we filed a motion for summary judgment on behalf of Hyatt Corporation (ECF Doc. 23). At this time, all Opposition and Reply briefs have been fully submitted and the parties are awaiting a decision or hearing for argument on the motion.

After all motion papers were submitted, Plaintiffs served Defendant with discovery requests. As discussed in our motion, Hyatt Corporation is not the owner, manager, or supervisor of the hotel where Plaintiffs’ accident occurred, and has no control over the hotel and its operations whatsoever. Moreover, Plaintiffs are aware of the correct entity responsible for the operations, management, supervision, and control of the hotel as well as the entity that owns it.

Finally, this stay request is not made in bad faith and will not prejudice the Plaintiffs’. However, it would prejudice Defendant to expend further litigation costs on discovery when they are not a proper party to this lawsuit.

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Very truly yours,

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